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June 10, 2022

BY ECF:

Hon. Colleen McMahon
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

RE: United States v. Amir Bruno Elmaani
Case No.: 1:20-cr-00661-1 (CM)
First Request for Adjournment of Status Conference

Dear Judge McMahon:

Please be advised that Spodek Law Group P.C. represents **Amir Bruno Elmaani**, the Defendant in the above-referenced matter.

We are currently scheduled to appear before Your Honor on June 15, 2022, at 2:00 PM for a decision on motions and a status conference. The defense has not filed any motions in this matter.

On June 15, 2022, when this matter is scheduled, I am scheduled to appear in United States v. Mandeep Singh, for sentencing, before the Honorable Geoffrey W. Crawford in the District of Vermont, under Case No.: 5:20-cr-00098-1 (GWC).

I am also scheduled to begin jury selection in People v. Jose Santana, in Bronx County Supreme Court before the Honorable Laurence E. Busching, under Ind. No.: 01784-2018 on July 18, 2022. The trial is expected to last at least two (2) weeks.

Further, the Government and I are discussing a possible pretrial resolution. I respectfully request that this matter be adjourned to any date in August or September, or anytime convenient to the Court. I consent to the exclusion of time until the next court date.

Lastly, I conferenced my request with AUSA Margaret Graham and the Government has no objection.

Hon. Colleen McMahon, *District Court Judge*
Page 2 of 2

Thank you for your consideration.

Sincerely,

Spodek Law Group P.C.
/S/ Todd A. Spodek

TS/az

cc: All Counsel (By ECF).